

# GAC Advice Response Form for Applicants



The Governmental Advisory Committee (GAC) has issued advice to the ICANN Board of Directors regarding New gTLD applications. Please see Section IV, Annex I, and Annex II of the [GAC Beijing Communiqué](#) for the full list of advice on individual strings, categories of strings, and strings that may warrant further GAC consideration.

Respondents should use this form to ensure their responses are appropriately tracked and routed to the ICANN Board for their consideration. Complete this form and submit it as an attachment to the ICANN Customer Service Center via your [CSC Portal](#) with the Subject, "[Application ID] Response to GAC Advice" (for example "1-111-11111 Response to GAC Advice"). All GAC Advice Responses must be received no later than 23:59:59 UTC on 10-May-2013.

## Respondent:

Applicant Name	Dot Registry, LLC
Application ID	1-880-35508
Applied for TLD (string)	.LLP

## Response:

As the only community applicant for the .LLP extension, Dot Registry, .LLP is acutely aware of the need for safeguards and registration policies that will ensure the long term integrity of the .LLP gTLD for both registrants and consumers.

Dot Registry's mission of building confidence, trust, reliance and loyalty for consumers and business owners alike; by creating a dedicated gTLD to specifically serve the Community of Registered Limited Liability Partnerships is supported through their registry service, registration policies, dispute resolution processes, and ICANN required rights protection mechanisms. Dot Registry will foster consumer peace of mind with confidence. By ensuring that all domains bearing our gTLD string are members of the Registered Community of US Limited Liability Partnerships. Our verification process will create an unprecedented level of security for online consumers by authenticating each of our registrant's right to conduct business in the United States. The ".LLP" gTLD will fill a unique void in the current DNS and assist in decreasing the burden on existing domain names, by identifying members of the Registered Community of Limited Liability Partnerships.

The social implications of business identity theft and consumer confusion are a paramount concern to DOT Registry. In our currently unstable economy, stimulating economic growth is vital. One means to such growth is by defusing the rampant, legitimate fear caused by online crimes and abuse, which leads to curtailed consumer behavior. By introducing the ".LLP" domain into the DNS, DOT Registry will attempt to reduce the social impact of identity theft on business owners which will in turn reduce consumer fears related to spending and ultimately boost economic growth in regards to consumption and purchase power.

Dot Registry's application currently contains the following registration policies and naming conventions, which directly address the concerns listed by GAC in their April 11th advice ( the below excerpts are pulled directly from our application response to question 18):



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- 1) A Registrant will only be awarded the “.LLP” domain that matches or includes a substantial part of the Registrant’s legal name. For example, Blue Star Partners, .LLP. would be able to purchase either BlueStarPartners.LLP or BlueStar.LLP.
- 2) Registrants will not be allowed to register product line registrations, regardless of the products affiliation to the corporation. All awarded domains must match or include a substantial part of the Registrant’s legal name.
- 3) If there are registrants applying for the same domain names, which correspond to their legal business names as registered in different states, then the “.LLP” domain will be awarded on a first-come, first-served basis to the first registrant.
- 4) However, if a registrant has a trademark registered with the United States Patent and Trademark Office (USPTO), then such registrant will have priority over any other registrant to be awarded the applied for “.LLP” domain.
- 5) If a registrant’s “.LLP” domain has already been awarded to another registrant with the same or similar legal name, then DOT Registry will offer to award such registrant a “.LLP” domain with a distinctive denominator including but not limited to a tag, company describer, or name abbreviation. For example, if BlueStar.LLP was awarded to Blue Star Partners, Inc. of California, then Blue Star Partners, Inc. of Kansas would be offered the opportunity to use BlueStarPartners.LLP.
- 6) DOT Registry will work closely with the Secretary of State’s Offices throughout the United States, with NASS and with a number of other agencies and organizations in maintaining the integrity and security of its domain names. DOT Registry will utilize the Secretary of States’ online resources to confirm that companies applying for their “.LLP” domain are in fact registered businesses.
- 7) All registrants that are awarded the “.LLP” domain will agree to a one-year minimum contract for their domain names that will automatically renew for an additional year on an annual basis if such contract is not terminated prior to the expiration of the renewal date.
- 8) DOT Registry or it’s designated agent will annually verify each registrants community status. Verification will occur in a process similar to the original registration process for each registrant, in which the registrars will verify each registrant’s “Active” Status with the applicable state authority. Each registrar will evaluate whether its registrants can still be considered “Active” members of the Community of Registered Limited Liability Partnerships. In this regard, the following items would be considered violations of DOT Registry’s Registration Guidelines, and may result in dissolution of a registrant’s awarded “.LLP” domain:
  - (a) If a registrant previously awarded the “.LLP” domain ceases to be registered with the State.
  - (b) If a registrant previously awarded a “.LLP” domain is dissolved and/or forfeits the domain for any reason.
  - (c) If a registrant previously awarded the “.LLP” domain is administratively dissolved by the State.Any registrant found to be “Inactive,” or which falls into scenarios (a) through (c) above, will be issued a probationary warning by their registrar, allowing for the registrant to restore its active status or resolve its dissolution with its applicable Secretary of State’s office. If the registrant is unable to restore itself to “Active” status within the defined probationary period, their previously assigned “.LLP” will be forfeited. DOT Registry reserves the right to change the definition of “Active” in accordance with the policies of the Secretaries of State. Domains will be temporarily suspended during the review process.
- 9) If DOT Registry discovers that a registrant wrongfully applied for and was awarded a “.LLP” domain, then such “.LLP” will be immediately forfeited to DOT Registry. Wrongful



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application includes but is not limited to: a registrant misrepresenting itself as a member of the Community of Registered Limited Liability Partnerships, a registrant participating in illegal or fraudulent actions, or where a registrant would be in violation of our abuse policies described in Question 28 (including promoting or facilitating spam, trademark or copyright infringement, phishing, pharming, willful distribution of malware, fast flux hosting, botnet command and control, distribution of pornography, illegal access to other computers or networks, and domain kiting/tasting).

10) In the case of domain forfeiture due to any of the above described options, all payments received by the Registrant for registration services to date or in advance payment will be non-refundable.

11) All registration information will be made publicly available. DOT Registry will not accept blind registration or registration by proxy. DOT Registry's registry services operator will provide thick WHOIS services that are fully compliant with RFC 3912 and with Specifications 4 and 10 of the Registry Agreement. Additionally, DOT Registry will provide a Web-based WHOIS application, which will be located at [www.whois.LLP](http://www.whois.LLP). The WHOIS Web application will be an intuitive and easy to use application which will allow the general public to easily access registration information for each ".LLP" site. A complete description of these services can be found in Question 26 below.

12) Awarded names are non-transferrable to entities outside of the designated community, regardless of affiliation to any member of the community. In the event that a registrant's business entity merges, is acquired, or sold, the new entity will be allowed to maintain the previously awarded ".LLP" domain until the domain renewal date, at which point they will be evaluated as described in number seven (7) above. Further, any entity acquiring a ".LLP" domain through the processes described in this guideline that does not meet the registration criteria and wishes to maintain the awarded domain will be allowed a grace period after the renewal verification process to correct any non-compliance issues in order to continue operating their acquired domain. If the said entity is unable to comply with DOT Registry's guidelines, the awarded domain will be revoked.

13) If an application is unable to be verified or does not meet the requirements of the sponsored community, the application will be considered invalid. In addition to Applicant's comprehensive eligibility, verification, and policing mechanisms, DOT Registry will implement a series of Rights Protection Mechanisms (RPM), including but not limited to: Support for and interaction with the Trademark Clearinghouse ("Clearinghouse"); use of the Trademark Claims Service; segmented Sunrise Periods allowing for the owners of trademarks listed in the Clearinghouse to register domain names that consist of an identical match of their listed trademarks; subsequent Sunrise Periods to give trademark owners or registrants that own the rights to a particular name the ability to block the use of such name; and stringent take down policies and all required dispute resolution policies. Dot Registry's dispute resolution processes, rights protection mechanisms, trademark clearing house procedures and whois verification information are further supported in their application in the following sections:

## Question 22

Protection of Geographic Names at the Second Level of your proposed gTLD

Applicant has thoroughly reviewed ISO 3166-1 and ISO 3166-2, relevant UN documents on the standardization of geographic names, GAC correspondence relating to the reservation of geographic names in the .INFO TLD, and understands its obligations under Specification 5 of the



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draft Registry Agreement. Applicant shall implement measures similar to those used to protect geographic names in the .INFO TLD by reserving and registering to itself all the geographic place names found in ISO-3166 and official country names as specified by the UN. Applicant has already discussed this proposed measure of protecting geographic names with its registry services provider, Neustar, and has arranged for such reservation to occur as soon after delegation as is technically possible.

## Question 26

### Whols Compliance

As with the .INFO TLD, only if a potential second-level domain registrant makes a proper showing of governmental support for country or territorial names will Applicant then relay this request to ICANN. At this point, Applicant would wait for the approval of the GAC and of ICANN before proceeding to delegate the domain at issue.

Applicant recognizes the importance of an accurate, reliable, and up-to-date WHOIS database to governments, law enforcement, intellectual property holders, and the public as a whole, and is firmly committed to complying with all of the applicable WHOIS specifications for data objects, bulk access, and lookups as defined in Specifications 4 and 10 to the Registry Agreement and relevant RFCs.

Applicant's back-end registry services provider, Neustar, has extensive experience providing ICANN and RFC-compliant WHOIS services for each of the TLDs that it operates both as a Registry Operator for gTLDs, ccTLDs, and back-end registry services provider. As one of the first "thick" registry operators in the gTLD space, the WHOIS service provided by Applicant's registry services operator has been designed from the ground up to display as much information as required by ICANN and respond to a very stringent availability and performance requirement.

Some of the key features of Applicant's WHOIS services will include:

- Fully compliant with all relevant RFCs including 3912;
- Production proven, highly flexible, and scalable (applicant's back-end registry services provider has a track record of 100% availability over the past 10 years);
- Exceeds current and proposed performance specifications;
- Supports dynamic updates with the capability of doing bulk updates;
- Geographically distributed sites to provide greater stability and performance; and
- Search capabilities (e.g., IDN, registrant data) that mitigate potential forms of abuse as discussed below.

Applicant's registry services operator will provide thick WHOIS services that are fully compliant with RFC 3912 and with Specifications 4 and 10 of the Registry Agreement.

Applicant's WHOIS service will support port 43 queries, and will be optimized for speed using an in-memory database and a master-slave architecture between SRS and WHOIS slaves. RFC 3912 is a simple text based protocol over TCP that describes the interaction between the server and client on port 43. Applicant's registry services operator currently processes millions of WHOIS queries per day.



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In addition to the WHOIS Service on port 43, Applicant will provide a Web-based WHOIS application, which will be located at [www.whois.LLP](http://www.whois.LLP). This WHOIS Web application will be an intuitive and easy to use application for the general public to use. The WHOIS Web application provides all of the features available in the port 43 WHOIS. This includes full and partial search on:

- Domain names
- Nameservers
- Registrant, Technical and Administrative Contacts
- Registrars

The WHOIS web application will also provide features not available on the port 43 service. These include:

- Extensive support for international domain names (IDN)
- Ability to perform WHOIS lookups on the actual Unicode IDN
- Display of the actual Unicode IDN in addition to the ACE-encoded name
- A Unicode to Punycode and Punycode to Unicode translator
- An extensive FAQ
- A list of upcoming domain deletions

Applicant will also provide a searchable web-based WHOIS service in accordance with Specification 4 Section 1.8 The application will enable users to search the WHOIS directory to find exact or partial matches using any one or more of the following fields:

- Domain name
- Contacts and registrant's name
- Contact and registrant's postal address, including all the sub-fields described in EPP (e.g., street, city, state or province, etc.)
- Registrar ID
- Name server name and IP address
- Internet Protocol addresses
- The system will also allow search using non-Latin character sets which are compliant with IDNA specification

The WHOIS user will be able to choose one or more search criteria, combine them by Boolean operators (AND, OR, NOT) and provide partial or exact match regular expressions for each of the criterion name-value pairs. The domain names matching the search criteria and their WHOIS information will quickly be returned to the user.

In order to reduce abuse for this feature, only authorized users will have access to the Whois search features after providing a username and password.

Applicant will provide third party access to the bulk zone file in accordance with Specification 4, Section 2 of the Registry Agreement. Credentialing and dissemination of the zone files will be facilitated through the Central Zone Data Access Provider, which will make access to the zone files in bulk via FTP to any person or organization that signs and abides by a Zone File Access (ZFA) Agreement with the registry. Contracted gTLD registries will provide this access daily and at no charge.

Applicant will also provide ICANN and any emergency operators with up-to-date Registration Data on a weekly basis (the day to be designated by ICANN). Data will include data committed as of 00:00:00 UTC on the day previous to the one designated for retrieval by ICANN. The file(s) will be made available for download by SFTP, unless ICANN requests other means in the future. Applicant's Legal Team will regularly monitor the registry service provider to ensure that they are providing the services as described above. This will entail random monthly testing of the WHOIS port 43 and Web-based services to ensure that they meet the ICANN Specifications and



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RFCs as outlined above, if not, to follow up with the registry services provider to ensure that they do. As the relevant WHOIS will only contain Applicant's information, Applicant's WHOIS services will necessarily be in compliance with any applicable privacy laws or

Question 28

Abuse Prevention and Mitigation

## General Statement of Policy

Abuse within the registry will not be tolerated. DOT Registry will implement very strict policies and procedures to minimize abusive registrations and other activities that have a negative impact on Internet users. DOT Registry's homepages will provide clear contact information for its Abuse Team, and in accordance with ICANN policy DOT Registry shall host NIC.LLP, providing access to .LLP's Whois services, the Abuse Policy, and contact information for the Abuse Team.

## Anti-Abuse Policy

DOT Registry will implement in its internal policies and its Registry-Registrar Agreements (RRAs) that all registered domain names in the TLD will be subject to a Domain Name Anti-Abuse Policy ("Abuse Policy").

The Abuse Policy will provide DOT Registry with broad power to suspend, cancel, or transfer domain names that violate the Abuse Policy. DOT Registry will publish the Abuse Policy on its home website at NIC.LLP and clearly provide DOT Registry's Point of Contact ("Abuse Contact") and its contact information. This information shall consist of, at a minimum, a valid e-mail address dedicated solely to the handling of abuse complaints, and a telephone number and mailing address for the primary contact. DOT Registry will ensure that this information will be kept accurate and up to date and will be provided to ICANN if and when changes are made.

In addition, with respect to inquiries from ICANN-Accredited registrars, the Abuse Contact shall handle requests related to abusive domain name practices.

Inquiries addressed to the Abuse Contact will be routed to DOT Registry's Legal Team who will review and if applicable remedy any Complaint regarding an alleged violation of the Abuse Policy as described in more detail below. DOT Registry will catalog all abuse communications in its CRM software using a ticketing system that maintains records of all abuse complaints indefinitely. Moreover, DOT Registry shall only provide access to these records to third parties under limited circumstances, such as in response to a subpoena or other such court order or demonstrated official need by law enforcement.

The Abuse Policy will state, at a minimum, that DOT Registry reserves the right to deny, cancel, or transfer any registration or transaction, or place any domain name(s) on registry lock, hold, or similar status, that it deems necessary to ; (1) to protect the integrity and stability of the registry; (2) to comply with applicable laws, government rules or requirements, or court orders; (3) to avoid any liability, civil or criminal, on the part of DOT Registry, as well as its affiliates, subsidiaries, officers, directors, and employees; (4) to correct mistakes made by the DOT Registry, registry services provider, or any registrar in connection with a domain name registration; (5) during resolution of any dispute regarding the domain; and (6) if a Registrant's



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pre-authorization or payment fails; or (7) to prevent the bad faith use of a domain name that is identical to a registered trademark and being used to confuse users.

The Abuse Policy will define the abusive use of domain names to include, but not be limited to, the following activities:

- **Illegal or fraudulent actions:** use of the DOT Registry's or Registrar's services to violate the laws or regulations of any country, state, or infringe upon the laws of any other jurisdiction, or in a manner that adversely affects the legal rights of any other person;
- **Spam:** use of electronic messaging systems from email addresses from domains in the TLD to send unsolicited bulk messages. The term applies to e-mail spam and similar abuses such as instant messaging spam, mobile messaging spam, and the spamming of Web sites and Internet forums;
- **Trademark and Copyright Infringement:** DOT Registry will take great care to ensure that trademark and copyright infringement does not occur within the .LLP TLD. DOT Registry will employ notice and takedown procedures based on the provisions of the Digital Millennium Copyright Act (DMCA) ;
- **Phishing:** use of counterfeit Web pages within the TLD that are designed to trick recipients into divulging sensitive data such as usernames, passwords, or financial data;
- **Pharming:** redirecting of unknowing users to fraudulent Web sites or services, typically through DNS hijacking or poisoning;
- **Willful distribution of malware:** dissemination of software designed to infiltrate or damage a computer system without the owner's informed consent. Examples include, without limitation, computer viruses, worms, keyloggers, and trojan horses.
- **Fast flux hosting:** use of fast-flux techniques to disguise the location of Web sites or other Internet services, or to avoid detection and mitigation efforts, or to host illegal activities. Fast-flux techniques use DNS to frequently change the location on the Internet to which the domain name of an Internet host or name server resolves. Fast flux hosting may be used only with prior permission of DOT Registry;
- **Botnet command and control:** services run on a domain name that are used to control a collection of compromised computers or "zombies," or to direct denial-of-service attacks (DDoS attacks);
- **Distribution of pornography;**
- **Illegal Access to Other Computers or Networks:** illegally accessing computers, accounts, or networks belonging to another party, or attempting to penetrate security measures of another individual's system (often known as "hacking"). Also, any activity that might be used as a precursor to an attempted system penetration (e.g., port scan, stealth scan, or other information gathering activity);
- **Domain Kiting/Tasting:** registration of domain names to test their commercial viability before returning them during a Grace Period;
- **High Volume Registrations/Surveying:** registration of multiple domain names in order to warehouse them for sale or pay-per-click websites in a way that can impede DOT Registry from offering them to legitimate users or timely services to other subscribers;
- **Geographic Name:** registering a domain name that is identical to a Geographic Name, as defined by Specification 5 of the Registry Agreement;
- **Inadequate Security:** registering and using a domain name to host a website that collects third-party information but does not employ adequate security measures to protect



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third-party information in accordance with that geographic area's data and financial privacy laws;

- Front Running: registrars mining their own web and Whois traffic to obtain insider information with regard to high-value second-level domains, which the registrar will then register to itself or an affiliated third party for sale or to generate advertising revenue;
- Whois Accuracy: Intentionally inserting false or misleading Registrant information into the TLD's Whois database in connection with the bad faith registration and use of the domain in question;
- Whois Misuse: abusing access to the Whois database by using Registrant information for data mining purposes or other malicious purposes;
- Fake Renewal Notices; misusing Whois Registrant information to send bogus renewal notices to Registrants on file with the aim of causing the Registrant to spend unnecessary money or steal or redirect the domain at issue.

## Domain Anti-Abuse Procedure

DOT Registry will provide a domain name anti-abuse procedure modeled after the DMCA's notice-and-takedown procedure.

At all times, DOT Registry will publish on its home website at NIC.LLP the Abuse Policy and the contact information for the Abuse Contact. Inquiries addressed to the Point of Contact will be addressed to and received by DOT Registry's Legal Team who will review and if applicable remedy any Complaint regarding an alleged violation of the Abuse Policy. DOT Registry will catalog all abuse communications and provide them to third parties only under limited circumstances, such as in response to a subpoena or other such court order or demonstrated official need by law enforcement.

Any correspondence ("Complaint") from a complaining party ("Complainant") to the Abuse Contact will be ticketed in DOT Registry's CRM software and relayed to DOT Registry's Abuse Team. A member of DOT Registry's Abuse Team will then send an email to the Complainant within forty-eight (48) hours of receiving the Complaint confirming receipt of the email and that DOT Registry will notify the Complainant of the results of the Complaint within ten (10) days of receiving the Complaint.

DOT Registry's Abuse Team will review the Complaint and give it a "quick look" to see if the Complaint reasonably falls within an abusive use as defined by the Abuse Policy. If not, the Contact will write an email to the Complainant within thirty-six (36) hours of sending the confirmation email that the subject of the complaint clearly does not fall within one of the delineated abusive uses as defined by the Abuse Policy and that DOT Registry considers the matter closed.

If the quick look does not resolve the matter, DOT Registry's Abuse Team will give the Complaint a full review. Any Registrant that has been determined to be in violation of DOT Registry policies shall be notified of the violation of such policy and their options to cure the violation. Such notification shall state:

- 1) the nature of the violation;
- 2) the proposed remedy to the violation;
- 3) the time frame to cure the violation; and



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4) the Registry's options to take subsequent action if the Registrant does not cure the violation.

If an abusive use is determined DOT Registry's Abuse Team will alert it's Registry services team to immediately cancel the resolution of the domain name. DOT Registry's Abuse Team will immediately notify the Registrant of the suspension of the domain name, the nature of the complaint, and provide the Registrant with the option to respond within ten (10) days or the domain will be canceled.

If the Registrant responds within ten (10) business days, it's response will be reviewed by the DOT Registry's Abuse Team for further review. If DOT Registry's Abuse Team is satisfied by the Registrant's response that the use is not abusive, DOT Registry's Abuse Team will submit a request by the registry services provider to reactivate the domain name. DOT Registry's Abuse Team will then notify the Complainant that its complaint was ultimately denied and provide the reasons for the denial. If the Registrant does not respond within ten (10) business days, DOT Registry will notify the registry services team to cancel the abusive domain name.

This Anti-Abuse Procedure will not prejudice either party's election to pursue another dispute mechanism, such as URS or UDRP.

With the resources of DOT Registry's registry services personnel, DOT Registry can meet its obligations under Section 2.8 of the Registry Agreement where required to take reasonable steps to investigate and respond to reports from law enforcement and governmental and quasi-governmental agencies of illegal conduct in connection with the use of its TLD. The Registry will respond to legitimate law enforcement inquiries within one (1) business day from receiving the request. Such response shall include, at a minimum, an acknowledgement of receipt of the request, questions, or comments concerning the request, and an outline of the next steps to be taken by Application for rapid resolution of the request.

In the event such request involves any of the activities which can be validated by DOT Registry and involves the type of activity set forth in the Abuse Policy, the sponsoring registrar is then given forty-eight (48) hours to investigate the activity further and either take down the domain name by placing the domain name on hold or by deleting the domain name in its entirety or providing a compelling argument to the registry to keep the name in the zone. If the registrar has not taken the requested action after the 48-hour period (i.e., is unresponsive to the request or refuses to take action), DOT Registry will place the domain on "serverHold".

## Maintenance of Registration Criteria

If a Registrant previously awarded the ".LLP" domain ceases to be registered with a Secretary of State or legally applicable jurisdiction, such Registrant will be required to forfeit the assigned ".LLP" domain at their designated renewal date.

If DOT Registry discovers that a Registrant wrongfully applied for and was awarded a ".LLP" domain, then such ".LLP" will be immediately forfeited to DOT Registry.

If a Registrant previously awarded a ".LLP" domain is dissolved and/or forfeited for any reason, then such ".LLP" domain will be forfeited to DOT Registry at their designated renewal time; unless such Registrant takes all reasonable steps to become reinstated and such Registrant is reinstated within six months of being dissolved and/or forfeited.

If a Registrant previously awarded the ".LLP" domain is administratively dissolved by the Secretary of State or legally applicable jurisdiction, then such ".LLP" will be forfeited to DOT



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Registry at their designated renewal time, unless such Registrant is reinstated within six months of being administratively dissolved.

A Registrant's "Active" Status will be verified annually. Any Registrant not considered "Active" by the definition listed above in question 18 will be given a probationary warning, allowing time for the Registrant to restore itself to "Active" Status. If the Registrant is unable to restore itself to "Active" status within the defined probationary period, their previously assigned ".LLP" will be forfeited. In addition, DOT Registry's definition of "Active" may change in accordance with the policies of the Secretaries of State.

## Orphan Glue Removal

As the Security and Stability Advisory Committee of ICANN (SSAC) rightly acknowledges, although orphaned glue records may be used for abusive or malicious purposes, the "dominant use of orphaned glue supports the correct and ordinary operation of the DNS." See <http://www.icann.org/en/committees/security/sac048.pdf>.

While orphan glue often supports correct and ordinary operation of the DNS, we understand that such glue records can be used maliciously to point to name servers that host domains used in illegal phishing, bot-nets, malware, and other abusive behaviors. Problems occur when the parent domain of the glue record is deleted but its children glue records still remain in the DNS. Therefore, when DOT Registry has written evidence of actual abuse of orphaned glue, DOT Registry will take action to remove those records from the zone to mitigate such malicious conduct.

DOT Registry's registry service operator will run a daily audit of entries in its DNS systems and compare those with its provisioning system. This serves as an umbrella protection to make sure that items in the DNS zone are valid. Any DNS record that shows up in the DNS zone but not in the provisioning system will be flagged for investigation and removed if necessary. This daily DNS audit serves to not only prevent orphaned hosts but also other records that should not be in the zone.

In addition, if either DOT Registry or its registry services operator becomes aware of actual abuse on orphaned glue after receiving written notification by a third party through its Abuse Contact or through its customer support, such glue records will be removed from the zone.

## Whols Accuracy

DOT Registry will provide Whols accessibility in a reliable, consistent, and predictable fashion in order to promote Whois accuracy. The Registry will adhere to port 43 Whols Service Level Agreements (SLAs), which require that port 43 WHOIS service be highly accessible and fast.

DOT Registry will offer thick Whols services, in which all authoritative Whols data—including contact data—is maintained at the registry. DOT Registry will maintain timely, unrestricted, and public access to accurate and complete Whols information, including all data objects as specified in Specification 4. Moreover, prior to the release of any domain names, DOT Registry's registrar will provide DOT Registry with an authorization code to verify eligible Registrants provide accurate Registrant contact information.



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In order to further promote Whois accuracy, DOT Registry will offer a mechanism whereby third parties can submit complaints directly to the DOT Registry (as opposed to ICANN or the sponsoring Registrar) about inaccurate or incomplete Whois data. Such information shall be forwarded to the registrar, who shall be required to address those complaints with their Registrants. Thirty days after forwarding the complaint to the registrar, DOT Registry will examine the current Whois data for names that were alleged to be inaccurate to determine if the information was corrected, the domain name was deleted, or there was some other disposition. If the registrar has failed to take any action, or it is clear that the Registrant was either unwilling or unable to correct the inaccuracies, DOT Registry reserves the right to cancel or suspend the applicable domain name(s) should DOT Registry determine that the domains are being used in a manner contrary to DOT Registry's abuse policy.

DOT Registry shall also require authentication and verification of all Registrant data. DOT Registry shall verify the certificates of incorporation, whether a corporation is in active status, contact information, e-mail address, and, to the best of its abilities, determine whether address information supplied is accurate. Second-level domains in the TLD shall not be operational unless two (2) out of three (3) of the above authentication methods have been satisfied.

With regard to registrars, DOT Registry shall provide financial incentives for pre-authentication of Registrant data prior to such data being passed to the registry. DOT Registry will provide for lower renewal and bulk registration fees in its RRAs for registrations which have been pre-authenticated and which DOT Registry can rely on as accurate data to be entered into its Whois database. Also in its RRAs, DOT Registry will also provide for higher fees and penalties for Registrant data which is obscured by proxies.

DOT Registry will also maintain historical databases of Registrants and associated information which have provided inaccurate Whois information. DOT Registry will endeavor to use this database to uncover patterns of suspicious registrations which DOT Registry shall then flag for further authentication or for review of the Registrant's use of the domain in question to ensure Registrant's use is consonant with DOT Registry's abuse policy.

In addition, DOT Registry's Abuse Team shall on its own initiative, no less than twice per year, perform a manual review of a random sampling of domain names within the applied-for TLD to test the accuracy of the Whois information. Although this will not include verifying the actual information in the WHOIS record, DOT Registry will be examining the WHOIS data for prima facie evidence of inaccuracies. In the event that such evidence exists, it shall be forwarded to the registrar, who shall be required to address those complaints with their Registrants. Thirty days after forwarding the complaint to the registrar, the DOT Registry will examine the current Whois data for names that were alleged to be inaccurate to determine if the information was corrected, the domain name was deleted, or there was some other disposition. If the registrar has failed to take any action, or it is clear that the Registrant was either unwilling or unable to correct the inaccuracies, DOT Registry reserves the right to suspend the applicable domain name(s) should DOT Registry determine that the Registrant is using the domain in question in a manner contrary to DOT Registry's abuse policy. DOT Registry shall also reserve the right to report such recalcitrant registrar activities directly to ICANN.

Abuse Prevention and Mitigation – Domain Name Access



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All domain name Registrants will have adequate controls to ensure proper access to domain functions.

In addition to the above, all domain name Registrants in the applied-for TLD will be required to name at least two (2) unique points of contact who are authorized to request and/or approve update, transfer, and deletion requests. The points of contact must establish strong passwords with the registrar that must be authenticated before a point of contact will be allowed to process updates, transfer, and deletion requests. Once a process update, transfer, or deletion request is entered, the points of contact will automatically be notified when a domain has been updated, transferred, or deleted through an automated system run by DOT Registry's registrar. Authentication of modified Registrant information shall be accomplished 48 Hours.

## Question 29

### Rights Protection Mechanisms

DOT Registry is committed to implementing strong and integrated Rights Protection Mechanisms (RPM). Use of domain names that infringe upon the legal rights of others in the TLD will not be tolerated. The nature of such uses creates security and stability issues for the registry, registrars, and registrants, as well as for users of the Internet in general. DOT Registry will protect the legal rights of others by implementing RPMs and anti-abuse policies backed by robust responsiveness to complaints and requirements of DOT Registry's registrars.

### Trademark Clearinghouse

Each new gTLD Registry will be required to implement support for, and interaction with, the Trademark Clearinghouse ("Clearinghouse"). The Clearinghouse is intended to serve as a central repository for information to be authenticated, stored, and disseminated pertaining to the rights of trademark holders. The data maintained in the Clearinghouse will support and facilitate other RPMs, including the mandatory Sunrise Period and Trademark Claims service.

Utilizing the Clearinghouse, all operators of new gTLDs must offer: (i) a Sunrise registration service for at least 30 days during the pre-launch phase giving eligible trademark owners an early opportunity to register second-level domains in new gTLDs; and (ii) a Trademark Claims Service for at least the first 60 days that second-level registrations are open. The Trademark Claims Service is intended to provide clear notice to a potential registrant of the rights of a trademark owner whose trademark is registered in the Clearinghouse.

### Sunrise A Period

DOT Registry will offer segmented Sunrise Periods. The initial Sunrise Period will last [minimum 30 days] for owners of trademarks listed in the Clearinghouse to register domain names that consist of an identical match of their listed trademarks. All domain names registered during the Sunrise Period will be subject to DOT Registry's domain name registration policy, namely, that all registrants be validly registered Limited Liability Partnerships and all applied-for domains will only be awarded the ".LLP" domain that matches or includes a substantial part of the Registrant's legal name. DOT Registry will assign its Rights Protection Team; which is lead by our



# GAC Advice Response Form for Applicants



Director of Legal and Policy and further supported by two dedicated employees to receive and authenticate all Sunrise Registrations.

DOT Registry's registrar will ensure that all Sunrise Registrants meet sunrise eligibility requirements (SERs), which will be verified by Clearinghouse data. The proposed SERs include: (i) ownership of a mark that is (a) nationally or regionally registered and for which proof of use, such as a declaration and a single specimen of current use – was submitted to, and validated by, the Trademark Clearinghouse; or (b) that have been court-validated; or (c) that are specifically protected by a statute or treaty currently in effect and that was in effect on or before 26 June 2008, (ii) optional registry elected requirements concerning international classes of goods or services covered by registration; (iii) representation that all provided information is true and correct; and (iv) provision of data sufficient to document rights in the trademark.

Upon receipt of the Sunrise application, DOT Registry will issue a unique tracking number to the Registrar, which will correspond to that particular application. All applications will receive tracking numbers regardless of whether they are complete. Applications received during the Sunrise period will be accepted on a first-come, first-served basis and must be active Limited Liability Partnerships in good standing before they may be awarded the requested domain, or able to proceed to auction. Upon submission of all of the required information and documentation, registrar will forward the information to DOT Registry's [RPM Team] for authentication. DOT Registry's [RPM Team] will review the information and documentation and verify the trademark information, and notify the potential registrant of any deficiencies. If a registrant does not cure any trademark-related deficiencies and/or respond by the means listed within one (1) week, DOT Registry will notify its registrar and the domain name will be released for registration.

DOT Registry will incorporate a Sunrise Dispute Resolution Policy (SDRP). The SDRP will allow challenges to Sunrise Registrations by third parties for a ten-day period after acceptance of the registration based on the following four grounds: (i) at time the challenged domain name was registered, the registrant did not hold a trademark registration of national effect (or regional effect) or the trademark had not been court-validated or protected by statute or treaty; (ii) the domain name is not identical to the mark on which the registrant based its Sunrise registration; (iii) the trademark registration on which the registrant based its Sunrise registration is not of national or regional effect or the trademark had not been court-validated or protected by statute or treaty; or (iv) the trademark registration on which the domain name registrant based its Sunrise registration did not issue on or before the effective date of the Registry Agreement and was not applied for on or before ICANN announced the applications received.

After receiving a Sunrise Complaint, DOT Registry's [RPM Team] will review the Complaint to see if the Complaint reasonably asserts a legitimate challenge as defined by the SDRP. If not, DOT Registry's [RPM Team] will send an email to the Complainant within thirty-six (36) hours of sending the confirmation email that the subject of the complaint clearly does not fall within one of the delineated grounds as defined by the SDRP and that DOT Registry considers the matter closed.

If the domain name is not found to have adequately met the SERs, DOT Registry's [RPM Team] will alert the registrar and registry services provider to immediately suspend the resolution of the domain name. Thereafter, DOT Registry's [RPM Team] will immediately notify the Sunrise Registrant of the suspension of the domain name, the nature of the complaint, and provide the



# GAC Advice Response Form for Applicants



registrant with the option to respond within ten (10) days to cure the SER deficiencies or the domain name will be canceled.

If the registrant responds within ten (10) business days, its response will be reviewed by DOT Registry's [RPM Team] to determine if the SERs are met. If DOT Registry's [RPM Team] is satisfied by the registrant's response, DOT Registry's [RPM Team] will submit a request to the registrar and the registry services provider to unsuspend the domain name. DOT Registry's [RPM Team] will then notify the Complainant that its complaint was ultimately denied and provide the reasons for the denial.

Names secured as described through the Sunrise AT/AD processes will result in the registration of resolving domain names at the registry. Names reserved through the Sunrise B process will not result in resolving domain name at DOT Registry. Rather, these names will be reserved and blocked from live use. The applied for string will resolve to an informational page informing visitors that the name is unavailable for registration and reserved from use.

Applications that fit the following criteria will be considered during the Sunrise A period:

Applicant owns and operates an existing domain name in another gTLD or ccTLD, in connection with eligible commerce and satisfies the registration requirements described in Section 1.

## Sunrise B

Applications that fit the following criteria will be considered during the Sunrise B period:

a) Applicant holds valid trademark registrations or owns rights to a particular name and wishes to block the use of such name.

b) The Applicant must seek to block a name that corresponds to the entire text of its trademark or the complete textual component of a graphical or compound trademark. Certain variances are permitted for trademarks containing spaces or special characters that are not available for domain names.

Any entity, applying for blocks under Sunrise B as a non-member of the sponsored community cannot apply for names in the TLD.

## Founder's Program

Applications for the Founder's Program will be accepted after the close of the Sunrise Periods. Potential registrants should understand that certain expectations, as described herein will accompany the issuance of a domain name under the Founder's Program and all registrations resulting from this program will be required to follow the below listed guidelines, which will be further described in their Program Agreement:

a) Registrants awarded a domain through the Founder's Program must use their best efforts to launch a ".LLP" website within 30 days of signing the Program Agreement.

b) In addition, each registrant will be required to issue a press release announcing the launch of their ".LLP" Founder Website, concurrent with the launch of their .LLP Founder Website, said press release must be approved by DOT Registry;

c) Founder's websites should be kept good working order, with unique, meaningful content, user-friendly interfaces, and broad user appeal, for the duration of the License Term,

d) Founders are expected to proactively market and promote ".LLP" gTLD in a manner that is likely to produce widespread awareness of the unique advantages gained through the ".LLP" string.

e) Founders are expected to participate in reasonable joint marketing initiatives with DOT Registry or its Agents, these would be discussed and mutually agreed upon, given the unique circumstances of each marketing venture.



# GAC Advice Response Form for Applicants



f) Founders will allow DOT Registry to use in good faith Founder's name, likeness, trademarks, logos, and Application contents (other than Confidential Information,) as well as other Founder information and content as may be mutually agreed, in DOT Registry's marketing, promotional and communications materials.

DOT Registry will randomly verify compliance of the above listed expectations and have the right to revoke any Founder's site, should they be deemed non-compliant.

## Landrush

Landrush is a limited time opportunity for companies that want to secure a high value ".LLP" name for a small fee (above the basic registration cost). The landrush period will last 30 days. Applications will be accepted and evaluated to determine if they meet the requirements for registration. At the end of the Landrush period domain names with only one application will be awarded directly to the DOT Registry. Domain names with two or more applications will proceed to a closed mini auction, between the respective DOT Registries, where the highest bidder wins.

## General Availability Period

DOT Registry must meet registration requirements.

Names will be awarded on a first-come, first serve basis which is determined as of the time of the initial request, not when authentication occurs.

## Domain Name Contentions

Name contentions will arise when both a Sunrise A and Sunrise B application are submitted for the same name, the following actions will be taken to resolve the contention.

a) Both DOT Registries will be notified of the contention and the Sunrise A DOT Registry will be given first right to either register their requested domain or withdraw their application. Since ".LLP" is a sponsored community domain for registered Limited Liability Partnerships, a domain applied for under Sunrise A will, all else being equal, receive priority over the identical domain applied for under Sunrise B. Sunrise A names get priority over Sunrise B names.

b) If the Sunrise A DOT Registry chooses to register their name regardless of the contention, then the Sunrise B DOT Registry may choose to pursue further action independently of DOT Registry to contest the name.

c) If two Sunrise A DOT Registries apply for the same domain name (i.e., Delta Airlines and Delta Faucet both seek to be awarded the use of DELTA.LLP) then DOT Registry will notify both DOT Registries of the contention and proceed to an auction process as described in Section 9.

d) If a Sunrise A DOT Registry and a Landrush DOT Registry apply for the same domain name, the Sunrise A DOT Registry, all else being equal will have priority over the Landrush DOT Registry.

e) If two Sunrise B DOT Registries apply for the same domain name (i.e., Delta Airlines and Delta Faucet, both seek to block the use of DELTA. INC), then DOT Registry will accept both applications as valid and block the use of the indicated domain.

## Appeal of Rejected Sunrise Applications

An DOT Registry can file a request for reconsideration within 10 days of the notification of DOT Registry's rejection. Reconsideration can be requested by completing a reconsideration form and filing a reconsideration fee with DOT Registry. Forms, fee information, and process documentation will be available on the DOT Registry website. Upon receipt of the reconsideration form and the corresponding fee, DOT Registry or its Agents will re-examine the application, and notify the Registrant of all findings or additional information needed. The Request for Reconsideration must be submitted through the Registrant's registrar, and a reconsideration fee must be paid to DOT Registry.

## Auctions



# GAC Advice Response Form for Applicants

Sunrise A names found to be in contention as described above will result in Auction. DOT Registry plans to have a qualified third party conduct our auction processes, therefore the rules contained in this document are subject to change based on the selection of an auctioneer:

a) When your auction account is created, it will be assigned a unique bidder alias in order to ensure confidential bidding. The bidder alias will not reflect any information about your account. You may change your bidder alias to a name of your choosing but once set, it cannot be changed again.

b) All auction participants are expected to keep their account information current, throughout the auction process.

c) Auction participants will receive up to date communication from the auctioneer as the auction progresses, bidding status changes, or issues arise.

d) Bidding

i) Auctions will follow a standard process flow: scheduled (upcoming), open and closed.

ii) You will receive an "Auction Scheduled" notice at least ten (10) days prior to the scheduled auction start date. You will receive an "Auction Start" notice on the auction start date, which will indicate that you may begin placing bids through the interface. Once closed, the auction is complete and if you are the winning bidder, you will proceed to the payment process.

iii) If you choose to bid for a particular domain and you are the highest bidder at the end of an auction, you are obligated to complete the transaction and pay the Auctioneer the amount of your winning bid. Carefully consider your bids prior to placing them - bids are not retractable under any circumstances.

iv) If no bids are placed on a particular domain, the Registry will register the domain on behalf of the first customer (in the respective phase) to submit an application through a registrar.

e) Extensions

i) A normal auction period is anticipated to last a minimum of 7 (seven) days. However, in the event of significant auction activity, an auction close may extend during the last twenty-four (24) hours of scheduled operation to better need the volume of the auction.

ii) Auction extensions are meant to provide a mechanism that is fair for bidders in all time zones to respond to being outbid.

iii) An auction extension will occur whenever the auction lead changes in the last twenty four (24) hours of the schedule of an auction. The close will be revised to reflect a new closing time set at twenty four (24) hours after the change in auction lead occurred. Essentially, this means that a winning maximum bid has to remain unchallenged for a period of twenty four (24) hours before the auction will close.

iv) It is important to note that extensions are not simply based on the auction value changing since this could occur as a result of proxy bidding where the same bidder retains their lead. In this case, the maximum bid has not changed, the leader has not changed and therefore no extension will occur.

f) Payment Default

In the event that you as the winning bidder decide not to honor your payment obligations (or in the event of a reversal of payment or a charge back by a credit card company or other payment provider) on any outstanding balance, the Registry has the right to cancel any/all of your winning registrations for any .LLP domain name, regardless of whether they have been paid for or not. You do not have the right to "pick and choose" the names you wish to keep or not keep. Winning an auction creates an obligation to remit payment. Failure to remit payment is a breach of your agreement.. You will lose any previously won domains and will no longer be allowed to bid on any current or future auctions sponsored by DOT Registry. Participants are encouraged therefore to consider carefully each bid submitted as any bid could be a winning bid.



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## Trademark Claims Service

DOT Registry will offer a Trademark Claims Service indefinitely to provide maximum protection and value to rights holders. The Trademark Claims Service will be monitored and operated by DOT Registry's RPM Team that will receive all communications regarding the Trademark Claims Service and catalog them. DOT Registry's registrar will review all domain name requests to determine if they are an identical match of a trademark filed with the Trademark Clearinghouse. A domain name will be considered an identical match when the domain name consists of the complete and identical textual elements of the mark, and includes domain names where (a) spaces contained within a mark that are either replaced by hyphens (and vice versa) or omitted; (b) certain special characters contained within a trademark are spelled out with appropriate words describing it (e.g., @ and &); and (c) punctuation or special characters contained within a mark that are unable to be used in a second-level domain name are either (i) omitted or (ii) replaced by spaces, hyphens or underscores. Domain names that are plural forms of a mark, or that merely contain a mark, will not qualify as an identical match.

If the registrar determines that a prospective domain name registration is identical to a mark registered in the Trademark Clearinghouse, the registrar will be required to email a "Trademark Claims Notice" (Notice) in English to the protective registrant of the domain name and copy DOT Registry's RPM Team. The Notice will provide the prospective registrant information regarding the trademark referenced in the Trademark Claims Notice to enhance understanding of the Trademark rights being claimed by the trademark holder. The Notice will be provided in real time without cost to the prospective registrant.

After receiving the notice, the registrar will provide the prospective registrant five (5) days to reply to the Trademark Claims Service with a signed document that specifically warrants that: (i) the prospective registrant has received notification that the mark is included in the Clearinghouse; (ii) the prospective registrant has received and understood the notice; and (iii) to the best of the prospective registrant's knowledge the registration and use of the requested domain name will not infringe on the rights that are the subject of the notice. If the warranty document satisfies these requirements, the registrar will effectuate the registration and notify DOT Registry's RPM Team.

After the effectuation of a registration that is identical to a mark listed in the Trademark Clearinghouse, the registrar will provide clear notice to the trademark owner consisting of the domain name that has been registered and copy DOT Registry's RPM Team. The trademark owner then has the option of filing a Complaint under the Uniform Domain Name Dispute Resolution Policy (UDRP) or the Uniform Rapid Suspension System (URS).

## Uniform Rapid Suspension System (URS)

DOT Registry will specify in the Registry Agreement, all RRAs, and all Registration Agreements used in connection with the TLD that it and its registrars will abide by all decisions made by panels in accordance with the Uniform Rapid Suspension System (URS). DOT Registry's RPM Team will receive all URS Complaints and decisions, and will notify its registrar to suspend all registrations determined by a URS panel to be infringing within a commercially reasonable time of receiving the decision. DOT Registry's RPM Team will catalog all abuse communications, but



# GAC Advice Response Form for Applicants



only provide them to third-parties under limited circumstances, such as in response to a subpoena or other such court order or demonstrated official need by law enforcement.

## Uniform Domain Name Dispute Resolution Policy (UDRP)

DOT Registry will specify in the Registry Agreement, all Registry-Registrar Agreements, and Registration Agreements used in connection with the TLD that it will promptly abide by all decisions made by panels in accordance with the Uniform Domain Name Dispute Resolution Policy (UDRP). DOT Registry's RPM Team will receive all UDRP Complaints and decisions, and will notify its registrar to cancel or transfer all registrations determined to be infringing within ten (10) business days of receiving the decision. DOT Registry's [RPM Team] will catalog all abuse communications, but only provide them to third-parties under limited circumstances, such as in response to a subpoena or other such court order or demonstrated official need by law enforcement.

## Proven Registrars

In order to reduce abusive registrations and other activities that affect the legal rights of others, DOT Registry will only contract with ICANN-accredited registrars. The registrar, according to the RRA, will not be able to register any domain names, thus eliminating the possibility of front-running.

## Pre-Authorization and Authentication

Registrant authentication shall occur in accordance with the registration eligibility criteria and the Anti-Abuse Policy for .LLP as set forth in Question 28.

The verification process is designed to prevent a prospective registrant from providing inaccurate or incomplete data, such that, if necessary, the registrant can be readily contacted regarding an infringing use of its site; indeed, the process (including verification of a registrant's certificate of incorporation) is designed to ensure that only qualified members of the community are permitted to register in the TLD.

DOT Registry will not permit registrants to use proxy services.

## Thick Whois

DOT Registry will include a thick Whois database as required in Specification 4 of the Registry agreement. A thick Whois provides numerous advantages including a centralized location of registrant information, the ability to more easily manage and control the accuracy of data, and a consistent user experience.

## Grace Period

If a Registrant previously awarded a ".LLP" domain is dissolved and/or forfeited for any reason, then such ".LLP" domain will be forfeited to DOT Registry at their designated renewal time; unless such Registrant takes all reasonable steps to become reinstated and such Registrant is reinstated within six months of being dissolved and/or forfeited.



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If a Registrant previously awarded the “.LLP” domain is administratively dissolved by the Secretary of State or legally applicable jurisdiction, then such “.LLP” will be forfeited to DOT Registry at their designated renewal time, unless such Registrant is reinstated within six months of being administratively dissolved.

## Takedown Procedure

DOT Registry will provide a Takedown Procedure modeled after the Digital Millennium Copyright Act’s notice-and-takedown procedure.

At all times, DOT Registry will publish on its home website at NIC.LLP contact information for receiving rights protection complaints (Complaint) from rights holders, including but not limited to trademark and copyright Complaints. Complaints will be addressed to and received by DOT Registry’s RPM Team who will catalogue and ticket in DOT Registry’s CRM software and review as outlined herein. DOT Registry will catalog all rights protection communications and only provide them to third parties under limited circumstances, such as in response to a subpoena or other such court order or demonstrated official need by law enforcement.

Any Complaint from a rights holder will be relayed to DOT Registry’s RPM Team. A member of DOT Registry’s RPM Team will then send an email to the Complainant within forty-eight (48) hours of receiving the Complaint confirming receipt of the email, and that DOT Registry will notify the Complainant of the results of the Complaint within (10) days of receiving the Complaint.

After sending the confirmation email, DOT Registry’s RPM Team will review the Complaint. If DOT Registry or its registrar determines that the registration was in bad faith, DOT Registry or its registrar may cancel or suspend the resolution of the domain name. Bad faith registration includes, but is not limited to, the registration of a domain identical to a registered trademark where the registrant has proceeded with registration after receipt of a Clearinghouse notice, as described above.

If the registrant responds within ten (10) business days, its response will be reviewed by the DOT Registry’s RPM Team. If DOT Registry’s RPM Team is satisfied by the registrant’s response that the content has been taken down or is not infringing, DOT Registry’s RPM Team will unsuspend the domain name. DOT Registry’s RPM Team will then notify the Complainant that its complaint was ultimately denied and provide the reasons for the denial. If the registrant does not respond within ten (10) business days, DOT Registry or its registrar may cancel or suspend the resolution of the domain name.

This Takedown Procedure will not prejudice any party’s election to pursue another dispute mechanism, such as URS or UDRP, as set forth in DOT Registry’s response to Question 28.

Further, Dot Registry has worked diligently to secure a strong relationship with the National Association of Secretaries of State (NASS) in order to accurately depict the necessary registration policies and programs that will protect the Community of Registered Limited Liability Partnerships. NASS was established in 1904 and is deemed the oldest non-partisan organization for public officials. Its membership consists of Secretaries of State and Lieutenant



## GAC Advice Response Form for Applicants



Governors responsible for the registration and maintenance of Limited Liability Partnerships in the US and its territories. Dot Registry has pledged to consult NASS throughout the life of the gTLD in regards to any changing state statutes, community admittance criteria, or policy adaptations in order to stay abridged of any changing state laws or registration guidelines. Additionally, Dot Registry is the only applicant who has established a relationship with the NASS or any Secretary of States Offices. As seen in our application and attached to this response the careful management of the .LLP gTLD is of vital importance to the Secretaries of State in the US. Dot Registry believes that the level of security necessary to responsibly operate this string can only be accomplished through a community gTLD. Further, Dot Registry is able to clearly define the registrants of this community, admittance requirements, commonality and has secured significant support from current members of the community. Further support of these assumptions can be seen in the attachments to question 20 of Dot Registry's application.



# State of Tennessee



The Secretary of State  
State Capitol  
Nashville, Tennessee 37243-0305

Tre Hargett  
Secretary of State

615-741-2819  
Tre.Hargett@tn.gov

February 22, 2013

Internet Corporation of Assigned Names and Numbers  
12025 Waterfront Drive  
Suite 300  
Los Angeles, CA 90094-2536

Subject: Letter of Support for the Restricted Use of the Top Level  
Domains, ".INC", ".LLC", ".CORP", and ".LLP"

To Whom It May Concern,

This letter confirms that the Tennessee Secretary of State's Office is charged with registering businesses in the State of Tennessee. In addition, my office monitors the position of good standing each of these businesses maintains and their overall right to conduct business transactions or commerce within the United States. The companies registered with this office are members of the larger community of registered U.S. Businesses, which can be further divided into the following designations: The Community of Registered Corporations, the Community of Registered Limited Liability Companies and the Community of Limited Liability Partnerships.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") is in the process of reviewing applications that refer to the business entity designations of INC, LLC, LLP and CORP. This office has been informed that DOT Registry, LLC has submitted community applications for these strings with restrictions that are intended to protect U.S. companies that are registered with the Secretary of State. With growing national concern about fraudulent business registration, business identity theft, and online consumer protection, this office believes that these strings should only be issued under a community designation in order to protect both the members of this community and consumers at large.

Our office believes that specific restrictions and policies must be in place to protect the community of U.S. Registered Businesses and to ensure that these extensions are only representative of members of their respective communities as verified through their respective Secretary of State's Office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tre Hargett".

Tre Hargett  
Secretary of State





## OFFICE OF THE SECRETARY OF STATE

ROSS MILLER  
*Secretary of State*

March 8, 2013

Internet Corporation of Assigned Names and Numbers  
12025 Waterfront Drive, Suite 300  
Los Angeles CA 90094-2536

**RE: Restricted Use of Domains using .inc, .llc, .corp and .llp**

TO WHOM IT MAY CONCERN;

My office is responsible for processing the organizational, amendatory and annual filings for Nevada corporations, limited liability companies, limited partnerships and other statutory business entities. These entities do business as Nevada entities not only in Nevada, but throughout the U.S. and around the world. My office is the second most popular business entity filing jurisdiction in the country, behind Delaware.

Fraudulent use of corporate entities, business identity theft and consumer protection are of growing concern to me, as is the potential of abuse by those offering online services. The free and unregulated issuance of names using these extensions is also a concern because of possible confusion or deception caused by entities that are not properly registered in my office.

It is my understanding that DOT Registry, LLC has applied to you for the use of the domain names with these extensions. I believe that restrictions and policies must be crafted not only to protect Nevada and U.S. entities, but also the consumers utilizing the associated web sites. I also understand that DOT Registry, LLC's application may include provisions protecting entities on file with my office, other Secretaries of State and state filing offices. Regardless of the applicant, such restrictions and protections must be in place.

I remain available if I can be of further assistance.

Respectfully,

A handwritten signature in blue ink that reads "Ross Miller".

ROSS MILLER  
Secretary of State

ONE HUNDRED ONE NORTH CARSON STREET, SUITE THREE  
CARSON CITY, NEVADA 89701-4786  
(775) 684-5708 • FAX (775) 684-5717





# STATE OF NEBRASKA

**JOHN A. GALE**  
**SECRETARY OF STATE**

**P.O. Box 94608**  
**State Capitol, Suite 2300**  
**Lincoln, NE 68509-4608**  
**Phone 402-471-2554**  
**Fax 402-471-3237**  
**[www.sos.state.ne.us](http://www.sos.state.ne.us)**

February 3, 2012

Dot Registry  
208 W 19<sup>th</sup> St  
Kansas City, Missouri 64108

Subject: Letter of support for the Restricted Use of the Top Level Domains, ".INC"  
and ".LLC"

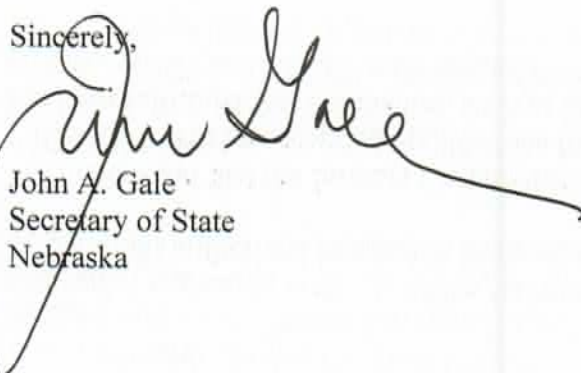
Ladies and Gentlemen:

This letter confirms that the State of Nebraska, Office of the Secretary of State, is charged with administering Nebraska's database of registered business entities. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC" with restrictions that are intended to protect U.S. companies and consumers that are registered with the Secretary of State.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a secretary of state or equivalent agency. It is important that registry companies provide access to the information provided by registered companies for jurisdictional purposes. Our office believes that such restrictions are integral to these strings and will object to the use of the strings, ".INC" and ".LLC" without any restrictions.

Sincerely,



John A. Gale  
Secretary of State  
Nebraska



ALVIN A. JAEGER  
SECRETARY OF STATE

HOME PAGE [www.nd.gov/sos](http://www.nd.gov/sos)



PHONE (701) 328-2900  
FAX (701) 328-2992  
E-MAIL [sos@nd.gov](mailto:sos@nd.gov)

**SECRETARY OF STATE**  
STATE OF NORTH DAKOTA  
600 EAST BOULEVARD AVENUE DEPT 108  
BISMARCK ND 58505-0500

March 23, 2012

Paul Spurgeon  
Dot Registry  
208 W 19th Street  
Kansas City MO 64108-2002

Dear Mr. Spurgeon,

I will not replicate the "form" letter on my letterhead that you requested for my signature in your e-mail message that I received today. It is not in a format or text that is comfortable for me.

However, because of my concern with the possible approval by ICANN of these extensions, I am willing to provide you with the enclosed letter. You may use it, as you deem appropriate.

By the way, NASS has not yet approved a letter, as referenced in your message. Although it was circulated through the membership of the Business Services Committee, the Executive Committee has not yet given final approval to the letter.

If Bill Clark or you have any questions or concerns about my letter, you are certainly welcomed to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Jaeger".

Al Jaeger  
Secretary of State

Cc William H. Clark Jr.



ALVIN A. JAEGER  
SECRETARY OF STATE

HOME PAGE [www.nd.gov/sos](http://www.nd.gov/sos)



PHONE (701) 328-2900  
FAX (701) 328-2992  
E-MAIL [sos@nd.gov](mailto:sos@nd.gov)

**SECRETARY OF STATE**  
STATE OF NORTH DAKOTA  
600 EAST BOULEVARD AVENUE DEPT 108  
BISMARCK ND 58505-0500

March 23, 2012

Internet Corporation for Assigned Names and Numbers  
1101 New York Avenue NW Suite 930  
Washington DC 20005

To Whom It May Concern:

As the Secretary of State, I have the administrative oversight of various business entity registrations filed in my state.

It is my understanding that your organization (ICANN) is now accepting applications for a new expanded top level domain name program. I have learned that extensions such as .INC, .LLC, .LLP, and .CORP may be under consideration and that is of significant concern to me.

If ICANN considers approving these extensions, I respectfully request that they be approved and awarded to a company that has submitted an application that includes restrictions they will abide by, which would provide all of the possible protection for legitimate businesses and consumers from confusion or fraud.

All of these mentioned extensions are recognized under North Dakota state law as a means of identifying various types of business entities that are legally filed with my office. Therefore, it is important to ensure that the website domain name being considered for a business entity is only extended to a business entity that has a corresponding legal registration identified with that domain name. These business entities, with their registration, have lawfully earned the right to use these entity identifiers. That right should not be infringed about by any company or individual that has not obtained the legal use of them through the registration process in one of the states.

Therefore, along with my fellow members of the National Association of Secretaries of State (NASS), I am of the opinion that these extension identifiers should only be extended to entities in their respective states that are legally and appropriately registered with the Secretary of State, or the equivalent state agency.

During the past several months, the NASS Business Services Committee (of which I am a member) has been considering the proposed ICANN program and has been reviewing the potential impact these new extensions would have on existing businesses and new businesses registering with the various states.

As one member of the committee, I believe it is fundamental that NASS be consulted by companies such as DOT Registry or any other applicants regarding policy related to the registering and identifying of businesses as this expanded program is considered by ICANN. And, if ICANN approves these extensions, the successful recipient will agree to extend the new extensions only to a "community" of businesses appropriately and legally registered in one of the various states.

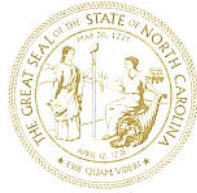
Without having appropriate restrictions in place, I would strongly oppose approving these extensions and awarding them to any company.

Sincerely,

A handwritten signature in dark ink, appearing to read "Al Jaeger", is written over a faint, larger version of the same signature.

Al Jaeger  
Secretary of State





**State of North Carolina**  
**Department of the Secretary of State**

ELAINE F. MARSHALL  
SECRETARY OF STATE

February 13, 2012

Dot Registry  
208 W 19<sup>th</sup> St  
Kansas City, MO 64108

Dear Ladies and Gentlemen:

This letter advises that the Department of the Secretary of State of North Carolina is charged with overseeing the business formation process for the formation of corporations, limited liability companies (LLCs), non-profit companies, professional associations, and several other types of business structures, as well as the maintenance of North Carolina's database relating to the aforementioned business entities. The businesses registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers (ICANN) will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC" with restrictions that are intended to protect U.S. companies and consumers that are registered with their state's administrator.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a Secretary of State or equivalent agency. I believe that entities not appropriately registered and maintained in any state should be prohibited from strings that would misrepresent their existence. As most Secretaries of State are not equipped to verify legitimate entity existence, even though we maintain that information, the verification process should be a requirement, albeit not ours.

Sincerely,

Elaine F. Marshall





STATE OF MINNESOTA  
Office of Minnesota Secretary of State  
Mark Ritchie

FAX COVER SHEET

DATE: Wednesday, February 13, 2013

TOTAL NUMBER OF PAGES (Including Cover Sheet): 2

RECIPIENT INFORMATION:	SENDER'S INFORMATION:
TO: SHAUL JOLLES	FROM: MARK RITCHIE
PHONE:	PHONE: 651-201-1324
FAX: 816-994-9333	FAX: 651-296-9073

SUBJECT: LETTER OF SUPPORT FOR THE RESTRICTED USE OF THE TOP LEVEL DOMAINS

COMMENTS/INSTRUCTIONS: LETTER ATTACHED





**STATE OF MINNESOTA**  
Office of the Minnesota Secretary of State  
Mark Ritchie

February 13, 2013

Internet Corporation of Assigned Names and Numbers  
12025 Waterfront Drive, Suite 300  
Los Angeles, California 90094-2536

Subject: Letter of support for the Restricted Use of the Top Level Domains, ".INC", ".LLC",  
".CORP", and ".LLP"

To Whom this May Concern:

This letter confirms that The Office of the Minnesota Secretary of State is charged with registering businesses in the State of Minnesota. In addition, my office monitors the position of good standing each of these businesses maintains and their overall right to conduct business transactions or commerce within the United States. The companies registered with this office are members of the larger community of registered U.S. Businesses which can be further divided into the following designations: The Community of Registered Corporations, The Community of Registered Limited Liability Companies, and the Community of Limited Liability Partnerships.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") is in the process of reviewing applications that refer to the business entity designations of INC, LLC, LLP and CORP. This office has been informed that DOT Registry, LLC has submitted community applications for these strings, with restrictions that are intended to protect U.S. companies that are registered with the Secretary of State. With the growing national concern related to fraudulent business registration, business identity theft, and online consumer protection, this office believes that these strings should only be issued under a community designation in order to protect both the members of this community and consumers at large.

Our office believes that specific restrictions and policies must be in place to protect the community of U.S. Registered Businesses and to ensure that these extensions are only representative of members of their respective communities as verified through their Secretary of States Office.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Ritchie".

MARK RITCHIE  
Secretary of State





**STATE OF MINNESOTA**  
Office of the Minnesota Secretary of State  
Mark Ritchie

February 1, 2012

Dot Registry  
208 W. 19<sup>th</sup> St.  
Kansas City, MO 64108

To Whom It May Concern:

This letter confirms that the State of Minnesota, Office of the Secretary of State, is charged with regulating and protecting Corporations registered in the State of Minnesota. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC." With restrictions that are intended to protect U.S. companies that are registered with the Secretaries of State.

We believe that such strings should only be issued to companies that are registered with a Secretary of State. Our office believes that such restrictions are integral to these strings and will object to the use of the strings, ".INC" and ".LLC." without restrictions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Ritchie", written over a horizontal line.

MARK RITCHIE  
Secretary of State



**KRIS W. KOBACH**  
Secretary of State



Memorial Hall, 1st Floor  
120 S.W. 10th Avenue  
Topeka, KS 66612-1594  
(785) 296-4575  
[www.sos.ks.gov](http://www.sos.ks.gov)

## STATE OF KANSAS

February 7, 2012

Dot Registry  
208 W 19<sup>th</sup> St  
Kansas City, Missouri 64108

Subject: Letter of support for the Restricted Use of the Top Level Domains,".INC"  
and ".LLC"

Ladies and Gentlemen:

This letter confirms that the State of Kansas, Office of the Secretary of State, is charged with administering Kansas's database of registered business entities. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC" with restrictions that are intended to protect U.S. companies and consumers.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a secretary of state or equivalent agency. It is important that registry companies provide access to the information provided by registered companies for jurisdictional purposes. Our office believes that such restrictions are integral to these strings and will object to the use of the strings, ".INC" and ".LLC" without any restrictions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris W. Kobach", written over a horizontal line.

Kris W. Kobach  
Secretary of State





**JASON KANDER**  
SECRETARY OF STATE  
STATE OF MISSOURI

CAPITOL OFFICE  
ROOM 208  
(573) 751-2379

JAMES C. KIRKPATRICK  
STATE INFORMATION CENTER  
(573) 751-4936

February 5, 2013

Internet Corporation of Assigned Names and Numbers  
12025 Waterfront Drive  
Suite 300  
Los Angeles, California 90094-2536

Subject: Letter of support for the Restricted Use of the Top Level Domains, ".INC" and ".LLC"  
".CORP", and ".LLP"

To Whom It May Concern:

The Missouri Secretary of State's Office is charged with overseeing the business formation process for the formation of corporations, limited liability companies, non-profit companies, professional associations, and several other types of business structures, as well as the maintenance of Missouri's database relating to the aforementioned business entities. The businesses registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") is in the process of reviewing applications that refer to the business entity designations of INC, LLC, LLP and CORP. With the growing national concern related to fraudulent business registration, business identity theft, and online consumer protection, this office believes that these strings should be issued under a community designation of companies that are registered with the Secretary of State or equivalent agency in order to protect both the members of this community and consumers at large.

Our office believes that specific restrictions and policies should be in place to protect the community of U.S. businesses and to ensure that these extensions are representative of members of their respective communities as verified through their Secretary of State's Office. Further, this office does not support the use of the strings, ".INC" and ".LLC" ".CORP", and ".LLP" without restrictions that protect this important community of registered US Businesses.

Sincerely,

A handwritten signature in black ink that reads "Jason Kander".

Jason Kander

JAMES C. KIRKPATRICK STATE INFORMATION CENTER  
600 W. MAIN STREET • JEFFERSON CITY 65101

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STATE OF DELAWARE  
DEPARTMENT OF STATE

JEFFREY W. BULLOCK  
SECRETARY OF STATE

March 20, 2012

ICANN  
Attn: gTLD Program  
4676 Admiralty Way  
Suite 330  
Marina del Rey, CA 90292-6601

To Whom It May Concern:

As Delaware's Secretary of State, I administer the State's company registry and am responsible for protecting the integrity of Delaware's legal entity registration system. Nearly one million legal entities, such as corporations and limited liability companies, (LLC) are organized in the United States under the laws of the State of Delaware.

The State of Delaware is the legal domicile of 63% of Fortune 500 companies, 55% of the firms listed on the two major U.S. stock exchanges, and 80% of new initial public offerings in the United States. Delaware is also the legal home to many of America's largest private-held and non-profit companies and hundreds of thousands of subsidiaries and affiliates of major companies around the world.

I understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new generic Top Level Domain (gTLD) name extensions this year. I have been informed that at least one firm – DOT Registry LLC – and possibly several other firms, plan to apply for the strings ".INC", ".CORP", ".LLC" and other potentially related extensions that state registries define as "company endings".

I join a chorus of federal and state officials who urge ICANN to proceed cautiously and deliberately in any approvals of new gTLDs. Delaware's view is that the granting of such name extensions creates a number of public policy issues and concerns – not the least of which is increasing the potential for fraud and abuse. As such, it is absolutely critical that if ICANN determines to grant such name extensions, that it does so in a restricted manner that is intended to protect consumers and the community of interest that exists among validly registered U.S. companies and my fellow State secretaries of state and other State company registrars that are responsible for administering the nation's legal entity registration system.



ICANN – gTLD program  
March 20, 2012

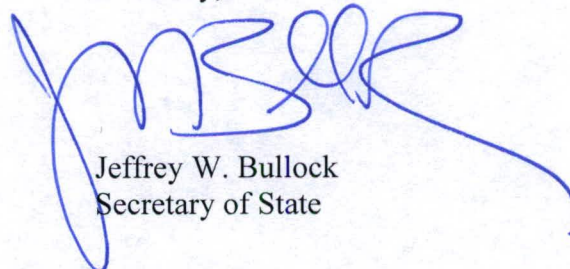
I therefore request that ICANN reject any request for the unrestricted use of “.INC”, “.LLC”, “.LLP”, “.CORP”, “.BANK”, “.TRUST” or similar commonly used company endings in the United States. The State of Delaware will object to the granting of such strings without restrictions.

I further request that, at a minimum, any approval for company ending strings be restricted in such a way that reasonably assures that the legal entity is, in fact, an active and validly registered legal entity in the United States, as DOT Registry LLC has proposed within its application. Specifically, any firm awarded the responsibility of administering such strings should be required to confirm whether the legal entity is validly formed according to criteria and documentation established by the states, and be required to check annually at renewal that the entity remains validly registered and actively in good standing according to criteria and documentation established by the states. The restrictions should further require that the homepage of such websites provide a mechanism that provides for the disclosure of the jurisdiction in which the entity is legally domiciled or include a geographic tag within the website name.

In order to reduce the risk of fraudulent activity, Delaware law places additional restrictions on the use of words such as “bank” and “trust” that are commonly associated with financial institutions. I therefore urge ICANN to seriously consider comment letters that have been submitted by the American Bankers Association and others urging ICANN to reject or place very significant restrictions on applications for the use of name extensions such as “.BANK” and “.TRUST”.

If you have any questions, please contact me or Richard J. Geisenberger, Chief Deputy Secretary of State, at 302-739-4111. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JBullock', with a long horizontal flourish extending to the right.

Jeffrey W. Bullock  
Secretary of State

cc: Richard J. Geisenberger, Chief Deputy Secretary of State  
Leslie Reynolds, Executive Director, National Association of Secretaries of State





STATE OF DELAWARE  
DEPARTMENT OF STATE

JEFFREY W. BULLOCK  
SECRETARY OF STATE

March 5, 2013

Heather Dryden  
Governmental Advisory Committee  
Attn: GAC Secretariat  
ICANN  
12025 Waterfront Drive #300  
Los Angeles, CA 90094

Suzanne Radell  
Senior Policy Advisor  
National Telecommunications and Information Administration (NTIA)  
Department of Commerce  
1401 Constitution Ave. NW  
Washington, DC 20230  
[SRadell@ntia.doc.gov](mailto:SRadell@ntia.doc.gov)

Dear Ms. Dryden and Ms. Radell:

As Delaware's Secretary of State, I administer the State's company registry, and am responsible for protecting the integrity of Delaware's legal entity registration system. Nearly one million legal entities such as corporations and limited liability companies (LLC) are organized in the United States under the laws of the State of Delaware.

The State of Delaware is the legal domicile of 64% of Fortune 500 companies, 55% of the firms listed on the two major U.S. stock exchanges, and 80% of new initial public offerings in the United States. Delaware is also the legal home to many of America's largest private-held and non-profit companies and hundreds of thousands of subsidiaries and affiliates of major companies in North America and around the world.



In March of 2012, I imparted my concerns about ICANN's application review process for generic Top Level Domain (gTLDs) name extensions defined by state and provincial registries as "company endings". Such company endings include, but are not limited to, ".INC", ".CORP", ".LLP", ".LTD", ".GMBH", ".COMPANY" and ".LLC". At that time, I joined a chorus of federal and state officials in the United States who had urged ICANN to proceed cautiously and deliberately in any approvals of new gTLDs. Delaware's view is that the granting of such name extensions creates a number of public policy issues and concerns – not the least of which is increasing the potential for fraud and abuse.

Since expressing my initial concerns, I have followed the application and early warning process closely. More recently, I've learned of ICANN's new "Public Interest Commitments" (PIC) process and its associated "Public Interest Commitment Dispute Resolution Process" (PICDRS). Having the benefit of ICANN's response to my initial concerns and having reviewed the applications that have been submitted, I have no confidence that ICANN is interested in or capable of putting a system of clear and transparent enforcement mechanisms in place to ensure that "company endings" are not used for fraudulent or misleading purposes.

The responses I have received from ICANN and others have failed to acknowledge in any way the complex public policy questions raised by allowing gTLDs that use company endings. Instead, the responses have focused entirely on the process for filing objections to applications. The singular focus on an approval process rather than recognizing the serious policy implications associated with its granting of certain gTLDs calls into question whether ICANN is capable of evaluating, instituting and enforcing meaningful measures to protect consumers and legitimate legal entities from fraud and abuse.

Over 30 applications were submitted for various company endings, and while some of the applications include a proposed verification process, many do not. Only one applicant sought any input whatsoever from the affected community in my state and nationally. So it is no surprise that applicants that did propose a verification system failed to propose systems with enforceable mechanisms for safeguarding consumers, the public at large, state regulators, and the Internet itself from the types of fraud and abuse that are likely to occur in the absence of specific safeguards.

At this stage of the gTLDs process, I continue to believe that the public is best served if these company endings are not made available for use. I do not see an overriding public policy purpose or strong business case for ICANN to make them available – especially when hundreds of additional gTLDs are soon to become available.

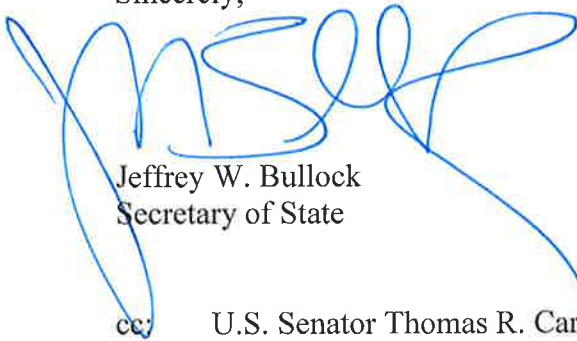
It is also clear to me that any enforcement mechanism administered through ICANN is unlikely to provide the appropriate level of ongoing enforcement over the use of these sensitive gTLDs. The new PICDRS process, while no doubt well-intentioned, requires constant vigilance by the impacted community of company registrars. Not awarding these gTLDs is the preferred alternative. However, if such gTLDs are to be awarded and if there is going to be an effective and real-time enforcement mechanism, it must originate from the community with the greatest interest – namely, the company registrar



community represented in North America by organizations such as the International Association of Commercial Administrators (IACA) and the National Association of Secretaries of States (NASS) or in the case of non-U.S. endings such as .GMBH and .LTD with similar registrar communities elsewhere.

I am pleased to share these concerns and recommendations with you and I would welcome the opportunity to discuss them in greater detail. I am hoping that the GAC may be the appropriate vehicle for blocking the award of such gTLDs and assuring that adequate protections for consumers and businesses are put in place. If you have any questions, please contact me or Richard J. Geisenberger, Chief Deputy Secretary of State, at 302-739-4111. Thank you for your consideration.

Sincerely,



Jeffrey W. Bullock  
Secretary of State

cc: U.S. Senator Thomas R. Carper  
U.S. Senator Christopher A. Coons  
U.S. Congressman John C. Carney, Jr.  
Richard J. Geisenberger, Chief Deputy Secretary of State  
Leslie Reynolds, Executive Director, NASS